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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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November 13, 2001

Hand Delivery

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: CC Docket No. 01-277: Application by BellSouth for Authorization to Provide In-Region InterLATA Services in Georgia and Louisiana

Dear Ms. Salas:

Enclosed for filing are the reply comments of WorldCom, Inc. in the above-captioned section 271 application of BellSouth for the states of Georgia and Louisiana. Please call me with any questions.

Sincerely,



Keith L. Seat

Enclosures

014

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of )

Application by BellSouth )

for Authorization to Provide In-Region, )

InterLATA Services in Georgia and Louisiana )

CC Docket No. 01-277

**REPLY COMMENTS OF WORLDCOM, INC. ON THE APPLICATION  
BY BELL SOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION,  
INTERLATA SERVICES IN GEORGIA AND LOUISIANA**

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November 13, 2001

## **INTRODUCTION AND EXECUTIVE SUMMARY**

BellSouth's systems have gotten even worse during the three weeks since WorldCom's initial Comments set forth the details of gravely deficient operational support systems ("OSS") and serious pricing concerns with BellSouth's section 271 application for Georgia and Louisiana. Indeed, BellSouth's recent problems are even greater than the U.S. Department of Justice ("DOJ") understood when it concluded just one week ago that BellSouth's application should not be approved due to Unbundled Network Element-Platform ("UNE-P") OSS issues. WorldCom emphasized in its initial Comments that OSS defects of the magnitude that infect the systems in Georgia have never been unremedied at the time of section 271 approval by the Commission, and BellSouth's posture now is worse than when it initially filed its application.

BellSouth attempted on November 3, 2001 to implement one of the more straightforward OSS enhancements required by the Georgia Commission, which would permit competitors to migrate customers by telephone number and name. Although this functionality has been successfully adopted by all other Bell Operating Companies ("BOCs"), BellSouth's efforts have caused substantial problems that immediately doubled WorldCom's reject rate. But the worst aspect of BellSouth's bungled release is that it underscores that BellSouth has very far to go in adopting proper change management and testing procedures and must significantly improve its interaction with competitive local exchange carriers ("CLECs"). BellSouth's November 3 failure occurred because it did not work with CLECs to provide adequate notice, information, specifications, or testing. Even if BellSouth is able to resolve the problems with its November 3 release, the underlying change management and testing problems cannot be resolved and verified

over the next several weeks, as they must be before BellSouth could appropriately receive section 271 authorization.

Nor has BellSouth resolved many other problems that were raised in WorldCom's initial

Comments:

- BellSouth's deficient line loss reporting appears to be increasingly serious, as well over one thousand local residential customers have complained to WorldCom about being improperly billed after moving to another carrier.
- BellSouth's incorrect routing of intraLATA calls through its own switches and erroneous transmission of intraLATA toll records on local Daily Usage Feeds is also becoming increasingly serious, with more than 28,000 erroneous call records transmitted to WorldCom in the past 90 days, resulting in improper charges for these records and, more important, an inability of the intraLATA carrier (often WorldCom) to collect revenue on the calls.
- BellSouth continues to use too much manual handling for simple migration orders, and still makes adjustments to its flow-through numbers without providing the underlying logic on which its calculations and adjustments are made.
- Additional BellSouth information highlights differences between Georgia and Louisiana OSS, undercutting BellSouth's assertions of uniformity throughout the region.
- BellSouth continues to have trouble with its level of rejects, even apart from the failed November 3 release. And it still fails to parse customer service records or provide adequate information to allow them to be parsed, fails to provide Interactive Agent, continues to have serious problems with loss of dial tone, and has not resolved problems with its performance plan.

In short, BellSouth needs to resolve a significant number of systems issues before section 271 authority would be appropriate for an "anchor" state in the BellSouth region. In addition to resolving these particular issues, BellSouth also needs to begin working much more effectively with CLECs to resolve additional OSS issues as they arise. Moreover, BellSouth has not resolved problems with its UNE rates, which are not cost-based and effectively bar WorldCom

from offering consumers a choice for local service anywhere in Louisiana, and limit WorldCom's competitive efforts to a single zone in Georgia.

WorldCom remains eager to work with BellSouth to resolve these practical systems issues but cannot do so without BellSouth's cooperation. The Commission should send BellSouth a strong message that it must work with CLECs to upgrade its systems and work more effectively with CLECs before being rewarded with interLATA entry. Thus, the Commission should deny the current application and encourage BellSouth to resolve its problems, ensure that the fixes actually work through commercial experience or valid third-party testing, and only then file a new section 271 application.

## TABLE OF CONTENTS

INTRODUCTION AND EXECUTIVE SUMMARY .....	i
TABLE OF APPENDICES .....	v
TABLE OF CITATION FORMS .....	v
A. BellSouth's Attempt at Migration by Telephone Number Reveals Serious OSS Deficiencies .....	2
Change Management Problems .....	7
B. BellSouth's Other OSS Problems Have Not Been Resolved.....	8
1. Loss of Dial Tone Continues .....	8
2. Numerous Line Loss Reports Are Missing.....	8
3. BellSouth Relies on Unacceptable Levels of Manual Processing .....	9
4. BellSouth Still Lacks Integratable Pre-order and Order Systems.....	11
5. BellSouth's Reject Level Is Unacceptable.....	12
6. BellSouth's Billing of IntraLATA Calls Must Be Corrected .....	14
7. Louisiana's OSS Differs from Georgia's OSS .....	15
CONCLUSION .....	16

## TABLE OF APPENDICES

Tab	Declarant	Subject
A	Joint Reply Declaration of Sherry Lichtenberg, Rene Desrosiers, Karen Kinard & Richard Cabe	Operations Support Systems and Performance Metrics

## TABLE OF CITATION FORMS

FCC Orders	
<u>Texas Order</u>	<u>In re Application by SBC Communications Inc., Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas</u> , CC Docket No. 00-65, Memorandum Opinion and Order, 15 F.C.C.R. 18354 (2000).
Declarations	
Lichtenberg, Desrosiers, Kinard & Cabe Decl.	Joint Reply Declaration of Sherry Lichtenberg, Rene Desrosiers, Karen Kinard & Richard Cabe on Behalf of WorldCom (Tab A hereto).
DOJ Evaluations	
<u>DOJ Ga. &amp; La. Eval.</u>	Evaluation of the Department of Justice, <u>In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</u> , CC Docket No. 01-277 (filed Nov. 6, 2001).
Filings	
Ga. PSC Report	Georgia Public Service Commission's Consultative Report, <u>In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</u> , CC Docket No. 01-277 (filed Oct. 20, 2001).

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
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**REPLY COMMENTS OF WORLDCOM, INC. ON THE APPLICATION  
BY BELL SOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION,  
INTERLATA SERVICES IN GEORGIA AND LOUISIANA**

BellSouth's OSS continues to suffer from many serious problems that must be resolved before BellSouth may properly receive in-region interLATA relief for an "anchor" state to which other BellSouth states can be compared. The primary change in the few weeks since WorldCom's initial Comments has been BellSouth's near disaster in trying to implement "migrate by telephone number," which highlights BellSouth's severe change management and testing deficiencies. In addition, as discussed in section B., BellSouth has not resolved the many other OSS issues that were set forth in our initial Comments.

BellSouth has suggested in ex parte filings that selected aspects of its OSS, such as its flow-through rate, are no worse than those of other BOCs that have obtained section 271 authorization. BellSouth has not, however, succeeded in making that showing even with respect to the individual OSS aspects it raises. BellSouth cannot make that showing with respect to its flow-through rate, for example, because it has yet to present verifiable flow-through numbers that are comparable to those presented by other BOCs. But even if BellSouth could make such a showing with respect to selected aspects of individual OSS issues, that would not demonstrate



BellSouth's OSS is acceptable. This Commission has emphasized that "[t]he determination of whether a BOC's performance meets the statutory requirements necessarily is a contextual decision based on the totality of the circumstances and information before us." Texas Order ¶ 57. The totality of the circumstances shows that BellSouth's OSS is markedly worse than the OSS of any BOC for which the Commission has previously granted section 271 authority, and BellSouth's continued problems with change management and failure to adequately assist CLECs mean that BellSouth is unlikely to be able to resolve future problems as they arise – even if it eventually resolves the specific problems detailed below.

**A. BellSouth's Attempt to Implement Migration by Telephone Number Reveals Serious OSS Deficiencies**

Just ten days ago, BellSouth attempted to implement one of the easier OSS enhancements required by the Georgia Commission, which would permit CLECs to migrate customers by telephone number and name, without having to provide an address. BellSouth's attempt caused tremendous problems, including the immediate doubling of WorldCom's reject rate. BellSouth's inability to enable CLECs to migrate customers by telephone number and name is troublesome on its own. Even more important, it further demonstrates the fundamental inadequacy of BellSouth's approach to change management and testing. The problems on November 3 occurred because BellSouth did not work with CLECs to provide adequate notice, adequate information and specifications, and adequate – or even any – testing. It is astonishing that five years after passage of the Telecommunications Act, BellSouth cannot accomplish these rudimentary aspects of change management. These basic change management and testing problems cannot be resolved and verified over the next several weeks, as needed before

BellSouth can prove checklist compliance. This is a critical issue, since BellSouth will have to implement additional important and complex changes in the months ahead that are required by the Georgia and Louisiana Commissions, as well as additional changes to fix new problems with its systems that will inevitably arise. If BellSouth does not greatly improve its change management processes, these future changes would appear to have little likelihood of success.

BellSouth's attempt to implement this relatively straightforward systems release is a remarkable illustration of BellSouth's OSS failures. As explained in WorldCom's initial Comments and confirmed by DOJ, it is vital for CLECs to be able to submit orders to migrate UNE-P customers based on the customers' telephone number and name only. DOJ Ga. & La. Eval. at 23-35 (telephone number migration is an "important precondition for competitive entry"). If a BOC requires CLECs to transmit addresses on migration orders, it leads to a large number of unnecessary rejects. As a result, WorldCom long ago submitted a change request asking BellSouth to accept UNE-P migration orders based on telephone number and name – as do other BOCs. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 5.

The Georgia Commission ultimately ordered BellSouth to implement this process of migration by telephone number and name. BellSouth did not provide user requirements until October 19, even though the change was scheduled to go into effect on November 3, failing to provide the 30-day notice to CLECs required by the change management process, based on the assertion that the change was not "CLEC-impacting" and was a regulatory change not covered by the documentation notice requirements. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 5.

Even the requirements BellSouth did provide on October 19 gave few details of the

proposed change. They were user requirements, not business rules, and were not designed to enable CLECs to code to the rules. Moreover, they were wrong. It appeared from the requirements that if CLECs continued to send addresses, BellSouth would edit against the addresses and would continue to reject orders if the addresses were incorrect. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 6. This was confirmed in an October 25 meeting when BellSouth told CLECs that they would have to alter their interfaces and stop transmitting addresses.<sup>1</sup> Id. ¶ 7. Subsequent developments, however, demonstrated that this was incorrect.

After the October 25 meeting, WorldCom decided not to attempt to change its systems prior to November 3 to begin submitting orders without addresses, in large measure because BellSouth's test environment was unavailable to test the change prior to implementing it in the production environment. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 8. Subsequent developments demonstrated this choice to have been a wise one, although it did not save WorldCom from the negative impact of BellSouth's change.

On November 2, one day before making the systems change, BellSouth informed CLECs that its internal testing of the release revealed that the change would not work for almost one-third of all orders submitted and that these orders would be rejected. BellSouth informed CLECs that to avoid this substantial problem they would have to continue submitting addresses on their orders. A single day's notice did not, of course, provide sufficient time for CLECs to again revise their internal systems to continue transmitting addresses. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 9.

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<sup>1</sup> This is clearly a CLEC-impacting change, despite BellSouth's assertions otherwise. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 7.

Since WorldCom had fortuitously decided not to immediately alter its systems to stop transmitting addresses, our orders were fully compliant with BellSouth's November 2 request that CLECs continue to transmit addresses when BellSouth implemented its systems change on November 3. Nonetheless, after BellSouth implemented its systems release on November 3, WorldCom began receiving large numbers of a new type of reject that we had never received previously. From November 3 through November 6, WorldCom received almost one thousand of the new rejects, which essentially doubled WorldCom's reject rate. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 11-12.

BellSouth had no reasonable explanation for this problem, and further stated that it could not work these numerous rejects manually if WorldCom re-submitted the orders.<sup>2</sup> Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 13.

At a meeting with BellSouth on November 7, BellSouth again changed its story and informed WorldCom that even when CLECs transmit addresses on their orders, BellSouth ignores those addresses and acts as if they have not been transmitted. Thus, contrary to BellSouth's November 2 letter and subsequent assertions, CLECs could not avoid the harmful effect of BellSouth's November 3 release by continuing to transmit addresses.<sup>3</sup> Just as

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<sup>2</sup> In working to resolve this problem, BellSouth did include an Information Technology ("IT") expert at a November 7 meeting, rather than just the personnel BellSouth ordinarily bring who lack any IT expertise. BellSouth's IT expert raised an issue of a new "trading partner ID" that WorldCom had begun using on October 6 but BellSouth asserted had not been properly loaded in its own systems. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 14-15. However, there had been no noticeable problem until BellSouth's November 3 systems change, suggesting that BellSouth's explanation is wrong or it was doing far more manual processing than WorldCom had known about. *Id.* ¶¶ 16-17.

<sup>3</sup> Remarkably, BellSouth explained that its written documentation, like other business rules, was drafted by individuals in its change management group – who had also made the statements at the October 25 meeting – but that these individuals had no connection to the IT personnel who actually wrote the software for BellSouth's systems. The IT personnel do not even review the written documentation, which helps explain why it is so difficult

WorldCom feared, BellSouth had implemented a release that would significantly harm CLECs no matter what steps they took. Of course, BellSouth's claim that it would ignore any addresses transmitted on CLEC migration orders was flatly inconsistent with what it had told CLECs in the October 25 meeting and with the best reading of the limited written documentation on the November 3 release.<sup>4</sup> Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 18-19.

BellSouth now claims that it will fix the problem caused by multiple addresses on November 17 by migrating customers based on part of the customers' address (the house number), as well as the telephone number. But that is not the functionality requested by WorldCom in its change request and ordered by the Georgia Commission, which was migration by telephone number and customer name.<sup>5</sup> Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 24-27. As with parsed Customer Service Records discussed below, however, BellSouth has decided to ignore the change requested by CLECs and implement its own version of the change.

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to obtain accurate and helpful information from BellSouth – a fundamental problem that underlies almost all of the difficulties that WorldCom has experienced with BellSouth's OSS. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 20.

<sup>4</sup> Even after BellSouth's IT personnel finally attended a meeting with WorldCom, BellSouth could not provide a cogent explanation of its underlying technical problem in implementing the systems change. BellSouth has attributed its difficulty to its need to obtain an address from its "RSAG" database and the fact that there are often multiple addresses in RSAG. But BellSouth should not need the address on a migration order at all. It is the telephone number, not the address, that is loaded into BellSouth's switches. According to BellSouth's IT expert, BellSouth needs to obtain an address on migration orders in order to use its due date calculator. But there is, of course, no reason that a due date should be calculated on a UNE-P migration order. No dispatch is needed on such an order and WorldCom transmits the standard UNE-P interval on all such orders. When WorldCom explained this, BellSouth responded that it needed to use the due date calculator to determine if the relevant central office was "open," which would suggest that BellSouth is disconnecting existing circuits and then connecting different circuits even though UNE-P translations, like all switch translations, are made remotely. WorldCom hopes that it is not the case that manual work is being performed on every migration, which would be a substantial problem itself – but might well explain why so many WorldCom customers continue to lose dial tone. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 21-23.

<sup>5</sup> It is important that a BOC perform edit checks to ensure that the name on the Local Service Request matches the telephone number transmitted. If a BOC performs a migration based only on the telephone number and a CLEC made an error in entering the telephone number, the BOC will migrate the wrong telephone number. Other BOCs,

Here, BellSouth is also flouting the order of the Georgia Commission. WorldCom has been forced to accede to this change in the hope that it will enable BellSouth to rapidly implement a process that will actually work. To date, however, BellSouth has failed to implement the functionality needed by CLECs to allow for smooth migration of UNE-P customers without the rejects caused by edits against a customer's full service address. Id. ¶¶ 25-28.

Change Management Problems. BellSouth's botched attempt to implement this new functionality emphasizes the fundamental flaws in BellSouth's change management process and in its relations with CLECs. BellSouth must provide adequate notice of all changes – including those that it claims are not CLEC-impacting. Along with providing notice, BellSouth must also provide complete and clear written documentation. In BellSouth's interaction with CLECs – both written and oral – it must include personnel with a full understanding of BellSouth's systems and changes being made to its systems, even if this requires participation by the outside vendors to whom BellSouth has contracted its IT functions. Finally, BellSouth must provide a separate test environment that is available at all times for testing of all releases – not just for a brief period surrounding implementation of those that BellSouth determines to be major releases. It is vital that CLECs be able to test a release and discover problems before that release is implemented, and also to discover and resolve any problems on their side of the interface. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 28.

BellSouth has made no progress in improving the change management process or test environment since WorldCom's initial Comments, but suffered the problems described above.

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including SWBT, Verizon, Pacific Bell and even Qwest, perform migrations based on telephone number and name. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 25

DOJ correctly concluded that the change management process must improve and an adequate test environment must be implemented. DOJ Ga. & La. Eval. at 26-29.

**B. BellSouth's Other OSS Problems Have Not Been Resolved**

WorldCom raised numerous OSS issues in its initial Comments that have not been resolved as they should be prior to section 271 authorization. We discuss below those issues that have changed or about which questions have been raised since the initial Comments.

**1. Loss of Dial Tone Continues**

Loss of dial tone continues to be a significant problem for WorldCom and its residential customers. As of November 2, the number of WorldCom customers who had lost dial tone within 30 days of the date on which WorldCom received a completion notice was 1,703. This amounts to 2.1% of WorldCom's installed base of customers in Georgia – a significant increase from the 1.8% that existed when WorldCom last reported the data on September 23, 2001. This is simply far too many customers losing dial tone within a short period of migration for the problems to be coincidental. While WorldCom does not have visibility into the cause of lost dial tone, it is highly unlikely that this many customers would have lost dial tone if they had not migrated from BellSouth. WorldCom has worked to try to determine the cause of the problem, but BellSouth has not been helpful. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 53-56.

**2. Numerous Line Loss Reports Are Missing**

Accurate line loss reports are critical, for without the reports a CLEC will continue to bill an end user even after the customer has discontinued service with the carrier. BellSouth still has

not produced an acceptable explanation for its failure to include a significant number of customers that migrate away from WorldCom on the line loss reports it transmits. BellSouth has acknowledged that some customers were left off the line loss reports as a result of its manual errors, but its explanation as to other omitted customers appears to be factually incorrect. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 41-43. WorldCom has no way of knowing how many line loss reports it does not receive, but the problem is substantial. Since launch, WorldCom has received over 1,285 complaints from customers asserting that they received bills from WorldCom after transferring to another carrier, and many more customers may have been double billed but have not yet called to complain. Id. ¶ 45.

### **3. BellSouth Relies on Unacceptable Levels of Manual Processing**

BellSouth processes too many orders manually in Georgia and Louisiana, resulting in delays and errors. Indeed, BellSouth has attributed much of its deficient performance to manual mistakes. But it is impossible to get a firm grip on how much manual processing BellSouth does and how many orders flow through, for BellSouth has repeatedly modified its flow-through data.

WorldCom is unaware of any improvements to BellSouth's flow-through process in recent weeks. It remains the case that when WorldCom reports ongoing problems to BellSouth, BellSouth blames many of these problems on manual errors. For example, BellSouth recently attributed remaining missing notifiers to manual problems, and also attributed line loss problems to manual errors. On October 25, BellSouth filed an ex parte letter in which it again re-stated its flow-through numbers. For UNEs, BellSouth's claimed flow-through rate dropped from 78.33% in June to 70.70%, from 90% in July to 67.36%, and from 93.13% in August to 80.82% – all



well below the 85% benchmark.<sup>6</sup> Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 46-47.

There is simply no reason to trust BellSouth's again-restated numbers. Indeed, numerous questions arise from a facial review of the reported data. For example, there is no explanation for the increase of more than thirteen percentage points in flow-through between July and August (from 67.36% in July to 80.82% in August). The restated numbers BellSouth has provided to WorldCom show an even more substantial increase for WorldCom specifically. But BellSouth has admitted that only very limited changes were made in BellSouth's systems during this time to increase flow-through. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 48. WorldCom has no way to verify the numbers because BellSouth has failed to provide the revised logic by which it calculates flow-through. *Id.* ¶ 50.

BellSouth suggests its flow-through performance is adequate by comparing its numbers to those of other BOCs, but it is impossible to know what BellSouth's flow-through performance actually is since its numbers keep changing, and, as just noted, BellSouth's changing logic for calculating these numbers is never provided. Moreover, BellSouth has acknowledged in state proceedings that it does not know how other BOCs calculate flow-through and thus does not know if its flow-through numbers can fairly be compared to theirs. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 55.

BellSouth's specific comparisons are inapposite in any event. BellSouth clearly has

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<sup>6</sup> These numbers are not BellSouth's "achieved flow-through" but rather its "percent flow-through" numbers. The latter do not count orders as falling out if they are designed to fall out and thus the numbers are misleadingly high. There is no reason that flow-through should not approach 100% once orders designed to fall out are excluded.

lower flow-through than existed in Texas at the time of SWBT's section 271 application there, according to BellSouth's own chart. Other states on the chart, Kansas, Oklahoma, and Massachusetts, were all states in which a section 271 application in the region had already been approved for another state with a much higher order volume and higher flow-through rate. In addition, in Massachusetts, New York and Pennsylvania, KPMG had demonstrated that Verizon's OSS was capable of flowing through almost all orders designed to flow through.

The fact is that this Commission has never before approved a section 271 application in a state where it is known that very basic UNE-P order types, such as orders for certain customers with voice mail or call forwarding do not flow through, where a third-party tester has found flow-through problems that remain unresolved, where the manual processing that does exist has been persistently connected with ongoing problems for CLECs, and where the BOC's claimed flow-through numbers – already low – are completely unverified and constantly changing. At a minimum, this Commission should await the results of KPMG's test in Florida, which is likely to provide real results on flow-through, as well as other important information. See DOJ Ga. & La. Eval. at 6-7 (Florida test is "more robust") & 30-38 (stating concerns about performance data, and flow-through rates specifically).

#### **4. BellSouth Still Lacks Integratable Pre-order and Order Systems**

BellSouth has not yet provided parsed Customer Service Records ("CSRs") and has not yet even provided written specifications for the parsed CSRs it is supposed to implement in January. BellSouth has provided no more than the sketchy documentation that does not match

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BellSouth does not present restated numbers for achieved flow-through in its ex parte letter. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 47.

the requirements agreed upon by CLECs and is missing 19 fields.<sup>7</sup> And the documentation does not set forth sufficient details for CLECs to code to even if they chose to code to this diluted version of parsed CSRs.

BellSouth may claim that the Commission allowed SWBT to enter the long distance market without providing parsed CSRs. But SWBT had shown, in a way that BellSouth has not, that it had enabled CLECs to integrate their pre-ordering and ordering interfaces without parsed CSRs. Texas Order ¶¶ 153-160. The Georgia Commission cites BellSouth's claim that a number of CLECs have successfully integrated pre-ordering and ordering interfaces as a basis for concluding that BellSouth's OSS is adequate even in the absence of parsed CSRs. Ga. PSC Report at 88. But one of the CLECs that BellSouth claimed had successfully integrated such interfaces was WorldCom, and WorldCom has not integrated its pre-ordering and ordering interfaces in Georgia and does not have documentation that would enable it to do so. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 30-32. Moreover, SWBT had not been holding up a change request for parsed CSRs for years, and had agreed to implement migration by telephone number shortly after CLECs requested the change.

#### **5. BellSouth's Reject Level Is Unacceptable**

Even apart from the extraordinary circumstances of BellSouth's failed software release on November 3, WorldCom's reject rate remains far too high. In October, the general reject rate on WorldCom UNE-P orders was 28.0%, while on migrations it was 26.7%. Twenty percent of the rejects that WorldCom received on migration orders were for address errors. Among these

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<sup>7</sup> BellSouth stated that the reason its requirements differed from those agreed upon by CLECs is that these requirements were never conveyed to its IT developers – further emphasizing the unacceptable chasm between its IT

address rejects, WorldCom continues to receive rejects stating that the address does not match the address in the CSR – even though BellSouth claims it does not check addresses against its CSR database. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 34.

In a November 2 ex parte letter, BellSouth attempts to defend its extremely high reject rate by stating that the reject rate is comparable to the rate of BOCs in several other states in which section 271 applications have been approved. In those states, however, it was plausible to suggest that the relatively high reject rates were the fault of CLECs and could not be attributed to the BOC's failure to adopt parsed CSRs or to provide migration by telephone number and name. In New York and Massachusetts, Verizon did provide parsed CSRs and migration by telephone number and name. In Missouri, SWBT provided migration by telephone number. And in Texas, although SWBT provided neither parsed CSRs nor migration by telephone number at the time of its application, SWBT adopted migration by telephone number and name before section 271 authority was granted – and it did so relatively soon after CLECs requested this functionality, making it much more difficult to blame SWBT for the absence of such functionality at an earlier date.<sup>8</sup>

Here, it is not plausible to claim that the high reject rate is the fault of CLECs. BellSouth has delayed implementation of parsed CSRs and migration by telephone number for years despite requests from CLECs. In addition, both KPMG and CLECs have specifically found that BellSouth returns rejects that are simply erroneous – including, for example, the rejects that BellSouth returned immediately after its November 3 release, discussed above. Finally, and

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developers and change management group. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶ 32.

most importantly, WorldCom is able to compare its reject rate in Georgia with the rate in other states it has entered – including the rate in states such as Illinois and Michigan that it entered relatively recently. WorldCom’s reject rate in Georgia is approximately double those in other states it has entered even though WorldCom uses the same systems and same representatives to process its orders. WorldCom Comments at 27-28.

It is also important to note that BellSouth’s comparison of reject rates presumes that it is accurately reporting its own reject rate. As WorldCom explained in its initial Comments, *id.*, BellSouth’s reported rate of rejects for WorldCom differs substantially from WorldCom’s own internal reports (which WorldCom maintains in the same manner as it does for other regions of the country it has entered). This may be because BellSouth excludes fatal rejects from its reports, which, as DOJ points out, may lead BellSouth to substantially understate its reject rate. DOJ Ga. & La. Eval. at 36, n.127.

#### **6. BellSouth’s Billing of IntraLATA Calls Must Be Corrected**

BellSouth has not corrected the problems that WorldCom has experienced with its wholesale bills, and problems with the daily usage feed (“DUF”) have grown worse. In its initial Comments, WorldCom explained that BellSouth had incorrectly transmitted usage information on 7,280 intraLATA calls to WorldCom in the DUF. BellSouth was routing some intraLATA toll calls through its local switches rather than through the switches of the intraLATA carrier. Thus, the intraLATA carrier (often WorldCom) was not receiving the revenue for these calls and BellSouth was charging WorldCom to transmit the records for these calls in the DUF.

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<sup>8</sup> In addition, in Texas the Commission concluded that only a relatively small percentage of rejects were related to address problems. Texas Order ¶ 178.

Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 63-64.

This problem has grown worse. In the past 90 days, BellSouth has erroneously transmitted 28,750 intraLATA call records in the DUF. WorldCom is not receiving the intraLATA revenue for these calls and is forced to pay to receive information on these calls as part of the DUF. Worse, BellSouth is still doing little or nothing to correct the problem, and WorldCom is concerned that this growing problem will become more severe. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 65-66.

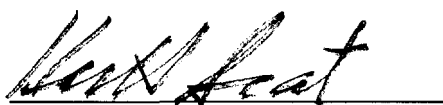
#### **7. Louisiana's OSS Differs from Georgia's OSS**

WorldCom's concerns that BellSouth's OSS differs notably between Louisiana and Georgia have been confirmed in recent weeks. But in sorting out whether it is a problem for WorldCom to omit from orders the asterisks that sometimes are present in BellSouth databases, BellSouth has acknowledged that removal of the asterisk will not cause WorldCom's orders to reject in the former Southern Bell states – including Georgia. In the former South Central Bell states, including Louisiana, BellSouth explained that removal of the asterisk from the addresses would cause WorldCom's orders to reject. Indeed, the reason BellSouth provided for why asterisks could not be removed in the South Central Bell states was that the OSS was “different” in these states. Lichtenberg, Desrosiers, Kinard & Cabe Reply Decl. ¶¶ 71-73. Thus, BellSouth's general statements in regulatory proceedings on the uniformity of its OSS in its region are incorrect or at least vastly oversimplified.

## **CONCLUSION**

BellSouth's Georgia-Louisiana application should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Lopardo", written over a horizontal line.

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November 13, 2001

## CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the Reply Comments of WorldCom, Inc. were sent via first class mail, postage paid, to the following on this 13<sup>th</sup> day of November, 2001.

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